

Approved by: _____

HAMZAH KHAN
Special Assistant United States Attorney

Before: THE HONORABLE KIM P. BERG
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA

: MISDEMEANOR
: COMPLAINT

-v-

: Violation of
: 38 C.F.R. 1.218(a)(5)

KENNETH J. SEABROOK

:
Defendant

: COUNTY OF OFFENSE:
: WESTCHESTER

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UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK, ss:

ANTHONY LUCIANO, being duly sworn, deposes and says that he is a Police Officer, assigned to the Department of Veterans Affairs Police Service, Franklin Delano Roosevelt Veterans Administration Hospital, Montrose, New York, which is located in the Southern District of New York, and charges as follows:

COUNT ONE

On or about October 12, 2022, at the Franklin Delano Roosevelt Veterans Administration Hospital, Montrose, New York, in the Southern District of New York, KENNETH J. SEABROOK, the defendant, unlawfully, knowingly and willfully impeded or disrupted the performance of official duties by Government employees and used loud, abusive, or otherwise improper language on Montrose Veterans Administration Hospital property, to wit: the defendant started yelling at staff and making threatening statements towards various staff.

(38 Code of Federal Regulations, 1.218(a)(5))

The basis for the deponent's knowledge and for the foregoing charges are, in part, as follows:

1. I am a Police Officer, assigned to the Department of Veterans Affairs Police Service, Franklin Delano Roosevelt Veterans Administration Hospital, Montrose, New York, which is located in the Southern District of New York.

2. Upon information and belief, on or about October 12, 2022, at approximately 9:33 a.m., social worker, Mary Baker, called Police Services to report that a patient, identified as the defendant, was on his way to the pharmacy to pickup his medication and appeared to be agitated. Ms. Baker stated while the defendant has been in her office he had made threatening comments.

3. Officer Carney responded to the pharmacy and spoke with the defendant, who appeared to be frustrated about the situation. The defendant stated he was there to get his medications and the "Asian pharmacist" needed to "mind her fucking business." Officer Carney asked the defendant if he made any threatening comments to or about any staff within the facility and the defendant stated no and left the pharmacy of getting his medications.

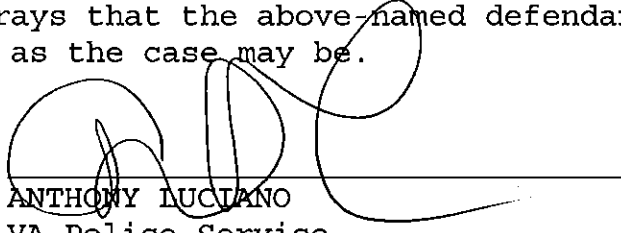
4. Officer Carney then went and spoke with Ms. Baker, who stated that while the defendant had been in her office that he stated he wanted to "drop bodies." Officer Carney then located the defendant in Building 12, and brought him to police services to further discuss the situation. The defendant stated that he was just expressing his frustration about the situation at the pharmacy with the pharmacist.

5. Officer Smith spoke with Dr. Sundaram who stated that the defendant had come to her clinic to be seen and was agitated and angry upon arrival. Dr. Sundaram stated that the defendant was upset because a pharmacist wouldn't fill his prescription because he hadn't seen a doctor in 10 months. Dr. Sundaram stated that the defendant became loud and was making threats to the pharmacist and other people while talking. He became so loud that other people in the office had to stop their work to come and deal with the commotion created by the defendant.

6. The defendant was issued a United States District Court

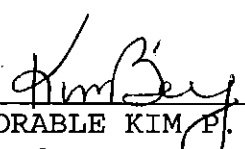
Violation Notice for disorderly conduct (DCVN Number 9044876/SY53).

WHEREFORE, deponent prays that the above-named defendant be imprisoned or bailed, as the case may be.



ANTHONY LUCIANO
VA Police Service

Sworn to before me this
21st day of December, 2022



HONORABLE KIM P. BERG
United States Magistrate Judge
Southern District of New York